

UNITED STATES BANKRUPTCY  
COURT EASTERN DISTRICT OF  
MICHIGAN NORTHERN DIVISION

IN RE:

ELITE ROOF GROUP, LLC

Chapter 11, Subchapter V  
Case No. 23-31987  
Hon. Joel D. Applebaum

Debtor.

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**STIPULATION FOR ENTRY OF  
ORDER CONFIRMING PLAN**

The Objecting Parties, by their signatures below, have resolved their objections to confirmation of Debtor's Subchapter V plan of reorganization through the terms of the attached Stipulated Order confirming Debtor's Subchapter V plan of reorganization and such parties stipulate to the entry of the attached Stipulated Order confirming Debtor's Subchapter V plan of reorganization and that this stipulation shall be deemed a vote to accept the plan as to parties entitled to vote under the Code.

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UNITED STATES TRUSTEE

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**STIPULATED ORDER CONFIRMING  
PLAN**

THE COURT having reviewed the stipulation of the parties;

WHEREFORE, THE COURT finds and concludes as follows:

1. All requirements for confirmation of the Debtor's Plan (as amended and modified by the terms of this Stipulated Order) under 11 U.S.C. 1191(a) and 1129 have been satisfied and the plan is confirmed pursuant to 11 U.S.C. 1191(a).
2. In the event this case is converted to a Chapter 7 all property of Elite Roof Group, LLC ("Elite Roof") (and the reorganized debtor) will revert in the estate.
3. The Debtor will remain responsible for filing timely Monthly Operating Reports until this case is confirmed, dismissed or converted to Chapter 7.
4. That the services of the Subchapter V Trustee will be terminated pursuant

to 11 U.S.C 1183 (c)(i) when the plan has been substantially consummated. Substantiated consummation shall be deemed to have occurred within 30 days of the first payments under the plan having been made. At that time the Debtor shall file and serve notice of consummation pursuant to 11 U.S.C 1183(c)(2).

5. This Court shall retain jurisdiction to the full extent and duration provided for by the current Bankruptcy Code.
6. Professionals shall file all claims for administrative expenses by June 15, 2024.
7. The Debtor's First Amended Plan shall be amended to provide as follows:
  - A. That confirmation of the Plan shall not result in a third-party release of either Matthew Camargo or Veronica Campanero; accordingly, paragraph 6.5 of the Plan is hereby deleted;
  - B. That the discharge granted in this order shall not operate to preclude any claims of setoff, recoupment or subrogation in connection with claims retained by Elite Roof;
  - C. Claim no. 2 filed by American Builders and Contractors Supply Co, Inc. ("ABC") and Claim No. 6 filed by Morningside Maiden Lane, LLC ("Morningside Owner") both include amounts related

to a lien recorded by ABC with the Washtenaw County Register

of Deeds at liber 5508 page 974 in connection with a real estate project, owned by Morningside Owner, located at 1100 Broadway in Ann Arbor, Michigan. If funds are exchanged between ABC and Morningside Owner in connection with this lien the creditor parties shall amend their claims accordingly.

D. Subject to paragraph C, Claim No. 6 filed by Morningside Owner shall be an allowed unsecured claim in the Debtor's Chapter 11 Case and under the confirmed Plan and Morningside Owner shall have an allowed unsecured claim in the amount of \$443,305.68. Likewise, Claim No. 7 filed by Morningside 1100 Constructors, LLC ("Morningside Constructors") shall be an allowed unsecured claim in the Debtor's Chapter 11 Case and under the confirmed Plan and Morningside Constructors shall have an allowed unsecured claim in the amount of \$456,069.25. Morningside Owner and Morningside Constructors by their stipulation to entry of this confirmation order shall be deemed to have accepted the Plan (as amended and modified by the terms of this Stipulated Order).

8. That upon entry by this Court Elite Roof shall serve this order on the matrix.